

1 ROB BONTA
Attorney General of California
2 DONNA M. DEAN
Supervising Deputy Attorney General
3 DAVID KLEHM
Deputy Attorney General
4 State Bar No. 165302
600 West Broadway, Suite 1800
5 San Diego, CA 92101
P.O. Box 85266
6 San Diego, CA 92186-5266
Telephone: (619) 738-9733
7 Fax: (619) 645-2581
E-mail: David.Klehm@doj.ca.gov
8 *Attorneys for Defendant* State of California
(by and through the California Highway
9 Patrol)

LAW OFFICES OF DALE K. GALIPO
Dale K. Galipo, Esq. (SBN 144074)
dalekgalipo@yahoo.com
Marcel F. Sincich; Esq. (SBN 319508)
msincich@galipolaw.com
21800 Burbank: Boulevard, Suite 310
Woodland Hills, CA 91367
Phone: (818) 347-3333 | Fax: (818) 347-4118
LAW OFFICES OF GRECH & PACKER
Trenton C. Packer (SBN 241057)
tpacker@grechpackerlaw.com
7095 Indiana Ave Ste 200
Riverside, CA 92506
Phone: (951) 682-9311
Attorneys for Plaintiff EDGAR SOLIS

10
11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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14

15 **EDGAR SOLIS,**

16
17 Plaintiff,

18 v.

19 **COUNTY OF RIVERSIDE; STATE**
20 **OF CALIFORNIA; SALVADOR**
21 **WALTERMIRE; and DOES 1-10,**
22 **inclusive,**

Defendants.

5:23-cv-00515-HDV-JPR

**JOINT STIPULATION TO MODIFY
THE SCHEDULING ORDER**

Judge: The Honorable Hernán
D. Vera
Trial Date: February 18, 2025
Action Filed: 2/02/2023

23 **TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR**
24 **ATTORNEYS OF RECORD:**

25 By and through their counsel of record in this action, Plaintiff EDGAR
26 SOLIS, and ST ATE OF CALIFORNIA (by and through California Highway
27 Patrol), and MICHAEL BELL (collectively "Defendants") (Plaintiff and
28

Defendants together called "the parties") hereby submit the following Joint Stipulation to Modify the Scheduling Order (Docs. 25):

1. On May 6, 2024, the parties filed their joint request for modification of the scheduling order regarding fact discovery and expert discovery. (Doc. 45.)

2. On May 15, 2024, the Court granted the parties' stipulation, in relevant part extending the expert discovery cut-off to June 28, 2024. (Doc. 48.)

3. On January 8, 2025, pursuant to an Order from the California Supreme Court, the 5th District Court of Appeal Ordered the trial court in a Kings County Superior Court case No. 23CU0433 in which Deputy Attorney General David Klehm is lead trial counsel to be advanced from March 3, 2025, to January 27, 2025.

4. Consequently, the parties request that the Final Pre-Trial Conference date currently scheduled for January 28, 2025, be continued one week to February 4, 2025, or a date during that same week convenient with the Court.

5. No other dates and deadlines will be affected by granting this Stipulation.

6. This is the Parties' fourth request for any modification to the scheduling order in this action.

STIPULATION FOR CONTINUANCE:

7. Accordingly, in light of the foregoing, and in order to facilitate the interests of all parties to this action, by and through their counsel of record in this action, the parties hereby Stipulate that Good Cause exists, and the parties respectfully request, that the Court modify the Scheduling Order as follows:

- To continue the Final Pre-Trial Conference from January 28, 2025, to February 4, 2025, or a date during that week convenient for the Court.

IT IS SO STIPULATED.

LAW OFFICES OF DALE K. GALIPO
LAW OFFICES OF GRECH & PACKER

Dated: January 8, 2025

Respectfully submitted,

/s/ Marcel F. Sincich

DALE K. GALIPO
MARCEL F. SINCICH
TRENT C. PACKER
Attorneys for Plaintiff

Dated: January 8, 2025

Respectfully submitted,

ROB BONTA
Attorney General of California
DONNA M. DEAN
Supervising Deputy Attorney General

/s/ David Klehm

DAVID KLEHM
Deputy Attorney General
Attorneys for Defendant State of
California (by and through the California
Highway Patrol)

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